

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>V.</b>	)	<b>CASE NO: 2:05-cr-266-WHA</b>
	)	
<b>JONATHAN N. GOLDEN</b>	)	

**UNOPPOSED MOTION TO CONTINUE TRIAL DATE**

**COMES NOW** the Defendant, Jonathan Golden, by and through undersigned counsel, Christine A. Freeman, and pursuant to 18 U.S.C. §§ 3161(h)(1)(I); 3161(h)(8)(b)(I); and 3161(h)(8)(b)(iv) respectfully moves this Court to continue the trial of this matter past the currently scheduled June 26, 2006 trial term. In support of this Motion, defendant would show the following:

1. Trial in this matter is presently scheduled for June 26, 2006.
2. Undersigned counsel is confident this matter will not proceed to trial.
3. A plea agreement has been negotiated and is presently awaiting finalization of its terms.
4. Additional time is necessary to investigate certain terms of the plea agreement, including the extent of cooperation.
5. Mr. Golden has no objection to the requested continuance and his speedy trial waiver is attached to this motion.
6. The United States, through Assistant United States Attorney Susan Redmond, has no opposition to this requested continuance.

**WHEREFORE**, Mr. Golden respectfully requests that this motion be granted.

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
Attorney for Jonathan Golden  
Federal Defenders  
Middle District of Alabama  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Susan Redmond, Esquire  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, Alabama 36104

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
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